

STATEMENT OF BASIS (AI No. 3599)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0109134 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Florida Gas Transmission Company
Compressor Station No. 7
Post Office Box 711
Eunice, Louisiana 70535

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Shontel Stewart

DATE PREPARED: July 13, 2006

1. PERMIT STATUS**A. Reason For Permit Action:**

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - NPDES permit effective date: Not applicable
NPDES permit expiration date: Not applicable
EPA has not retained enforcement authority.

C. LWDPS permit - LWDPS (WP 3343) permit effective date: March 8, 1996
LWDPS permit expiration date: March 7, 2001

D. Date Application Received: August 28, 2000 with additional information received via letter March 14, 2001 and February 9, 2004.

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - natural gas compressor station**

The existing natural gas compressor station is part of the Florida Gas Transmission Company pipeline system which moves natural gas from the production fields in the west to the market in the east. The facility discharges of stormwater runoff, engine washdown water, engine jacket water, and cooling tower blowdown as well as treated sanitary wastewater. The facility discharges to Bayou Des Cannes via unnamed creek.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 4922

Statement of Basis for
 Florida Gas Transmission Company, Compressor Station No. 7
 LA0109134, AI No. 3599
 Page 2

C.LOCATION - 6.3 miles southwest of Eunice on Parish Road P-30, Acadia Parish
 (Latitude 30°27'58", Longitude 92°29'24")

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: Intermittent discharge of stormwater runoff and previously monitored effluent from Internal Outfalls 101 and 201
 Treatment: None
 Location: At the point of discharge from the west side of the facility
 Flow: 1075 GPD
 Discharge Route: To an unnamed creek at the southwest side of the facility to Bayou Des Cannes

Outfall 101 (Internal)

Discharge Type: Intermittent discharge of engine washdown water, engine jacket water, and cooling tower blowdown
 Treatment: Oil/water separator prior to entering a retention pond
 Location: At the point of discharge from the retention pond at the south end of the facility on the north bank of the unnamed creek
 Flow: 1000 GPD
 Discharge Route: Via Outfall 001 to an unnamed creek at the southwest side of the facility to Bayou Des Cannes

Outfall 201 (Internal)

Discharge Type: Intermittent discharge of treated sanitary wastewater
 Treatment: Septic tank system followed by an aerated aerobic system
 Location: At the point of discharge from the aerated aerobic treatment system at the south west end of the facility on the north bank of the unnamed creek
 Flow: 75 GPD
 Discharge Route: Via Outfall 001 to an unnamed creek at the southwest side of the facility to Bayou Des Cannes

4. RECEIVING WATERS

STREAM - Bayou Des Cannes via unnamed creek

BASIN AND SUBSEGMENT - Mermentau River Basin, Subsegment 050101

DESIGNATED USES - a. primary contact recreation
 b. secondary contact recreation
 c. propagation of fish and wildlife
 f. agriculture

Statement of Basis for
 Florida Gas Transmission Company, Compressor Station No. 7
 LA0109134, AI No. 3599
 Page 3

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

LDEQ records were reviewed for the period from January 2003 through December 2005. No records of enforcement actions were found and a compliance inspection performed on December 9, 2005 revealed "No areas of concern".

B. DMR Review/Excursions

Based on a review of DMR data for the period from January 2003 through December 2005, the facility has had the following excursions:

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
12/03	TSS	201	70 mg/L	45 mg/L
06/04	Fecal Col.	201	>3300 col/100mL	400 col/100 mL
08/04	Fecal Col.	201	>12000 col/100mL	400 col/100 mL
08/04	TSS	201	61 mg/L	45 mg/L
06/05	pH	101	9.23 s.u.	9.0 s.u.

7. CHANGES FROM EXISTING PERMIT

The following changes have been made from the 1996 LWDPS permit:

A. For Outfall 001, the location of the outfall is corrected from the existing permit to reflect the proper location.

B. In a letter received March 14, 2001, the applicant requested the addition of a second sanitary outfall (Outfall 301) to address sanitary wastewater from additional office space to be located near the northeast corner of the property. However, in a letter received February 9, 2004, the applicant indicated that additional office space would not be constructed and that the additional outfall was no longer desired. Outfall 301 has therefore not been included in the draft permit.

C. A Stormwater Pollution Prevention Plan (SWP3) requirement is added to the draft permit, in accordance with current DEQ stormwater policy.

Statement of Basis for
Florida Gas Transmission Company, Compressor Station No. 7
LA0109134, AI No. 3599
Page 4

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 050101 of the Mermentau River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005 from Russell Watson (FWS) to Karen Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

a local newspaper of general circulation and

Office of Environmental Services Public Notice Mailing List

Statement of Basis for
 Florida Gas Transmission Company, Compressor Station No. 7
 LA0109134, AI No. 3599
 Page 5

Rationale for Florida Gas Transmission Company

1. **Outfall 001:** Intermittent discharge of stormwater runoff and previously monitored effluent from Internal Outfalls 101 and 201.

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	Report:Report	LAC 33:IX.2707.I.1.b
TOC	---:50 mg/L	BPJ; *, **; LDEQ Stormwater Guidance
Oil & Grease	---:15 mg/L	BPJ; *, **; LDEQ Stormwater Guidance
pH	6 su - 9 su	BPJ; *, **; LDEQ Stormwater Guidance
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*	Existing permits for similar outfalls	
**	General Rationale for Natural Gas Processing Plants and Compressor Stations (revised 1/7/04)	
BPJ	Best Professional Judgement	
su	Standard Units	

Treatment: None

Monitoring Frequency: Flow, TOC, oil and grease, and pH are monitored once per quarter.

Limits Justification: Flow reporting is consistent with LAC 33:IX.2707.I.1.b. TOC, oil and grease, and pH limitations are BPJ based on the 1996 state permit, existing permits for similar outfalls, General Rationale for Natural Gas Processing Plants and Compressor Stations (revised 1/7/04), and LDEQ Stormwater Guidance.

Statement of Basis for
 Florida Gas Transmission Company, Compressor Station No. 7
 LA0109134, AI No. 3599
 Page 6

2. **Outfall 101:** Intermittent discharge of engine washdown water, engine jacket water, and cooling tower blowdown.

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow COD	Report:Report ---:125 mg/L	LAC 33:IX.2707.I.1.b BPJ; *, **
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*	Existing permits for similar outfalls	
**	General Rationale for Natural Gas Processing Plants and Compressor Stations (revised 1/7/04)	
BPJ	Best Professional Judgement	
su	Standard Units	

Treatment: Oil/water separator prior to entering a retention pond

Monitoring Frequency: All parameters are monitored once per month.

Limits Justification: Flow reporting is consistent with LAC 33:IX.2707.I.1.b. The COD limitation is BPJ based on the 1996 state permit, General Rationale for Natural Gas Processing Plants and Compressor Stations (revised 1/7/04), and existing permits for similar outfalls.

Statement of Basis for
Florida Gas Transmission Company, Compressor Station No. 7
LA0109134, AI No. 3599
Page 7

3. **Outfall 201:** Intermittent discharge of treated sanitary wastewater

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow (MGD)	Report:Report	LAC 33:IX.2707.I.1.b
BOD ₅	---:45	BPJ; Class I Sanitary General Permit LAG530000
TSS	---:45	BPJ; Class I Sanitary General Permit LAG530000
Fecal Coliform	---:400 col/100 mL	BPJ; Class I Sanitary General Permit LAG530000

BPJ Best Professional Judgement

Treatment: Septic tank system followed by an aerated aerobic system

Monitoring Frequency: All parameters are monitored once per six months. Monitoring frequencies are established based on the General Permit for Class I Sanitary Discharges, LAG530000.

Limits Justification: Flow reporting is consistent with LAC 33:IX.2707.I.1.b. All limitations are BPJ based on previous permit, existing permits with similar outfalls, and Class I Sanitary General Permit LAG530000.

4. **303 (d)/TMDL Waterbodies**

Statement of Basis for
Florida Gas Transmission Company, Compressor Station No. 7
LA0109134, AI No. 3599
Page 8

4. 303 (d)/TMDL Waterbodies

Subsegment 050101 is listed on LDEQ's 2004 Integrated 303(d) list as impaired for mercury, pathogen indicators, organic enrichment/low DO, nutrients, suspended solids, TSS/turbidity/siltation, turbidity, carbofuran, fipronil, and phosphorous. TMDLs have been completed for all impairments. Those suspected causes of impairment which are not directly attributed to natural gas compressor station point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL.

Mercury

The Mercury TMDLs for Subsegments within Mermentau and Vermilion-Teche River Basins, final April 5, 2001, developed TMDLs for non-point sources of mercury with the major source identified as atmospheric deposition. This facility was not given a wasteload allocation for this pollutant. Per the TMDL, point source loads are so small as to be insignificant. Therefore, no requirements for mercury are established in the draft permit.

Fecal Coliform

The Bayou des Cannes TMDL for Fecal Coliform, final April 5, 2001, developed waste load allocations for point sources of fecal coliform. Per the TMDL, this facility was not included in the TMDL development modeling and no waste load allocation was assigned to this facility. Therefore, the current permit limit for fecal coliform is considered to be sufficient and no additional requirements for fecal coliform are established in the draft permit.

Dissolved Oxygen/Low DO

The Bayou des Cannes TMDL for Dissolved Oxygen and Nutrients, February 25, 2000, identified the Town of Iota as the only significant contributor to dissolved oxygen/low DO as well as nutrients. This facility was not given a wasteload allocation for this pollutant. Per the TMDL, point sources other than the Town of Iota are so small as to be insignificant. Therefore, no requirements for dissolved oxygen/low DO are established in the draft permit. The current permit limits for oxygen demanding pollutants are considered to be sufficient and no additional requirements for oxygen demanding pollutants are established in the draft permit.

Nutrients

The Bayou des Cannes TMDL for Nutrients, final May 2, 2002, developed TMDLs for nutrients, which identified the Town of Iota as the only significant contributor to elevated nitrogen levels. This facility was not given a wasteload allocation for this pollutant. Per the TMDL, point sources other than the Town of Iota are so small as to be insignificant. Therefore, no requirements for nutrients are established in the draft permit.

Pathogen Indicators

The Bayou des Cannes TMDL for Fecal Coliform, final April 5, 2001, developed waste load allocations for point sources of fecal coliform. This facility was not given a wasteload allocation

Statement of Basis for
 Florida Gas Transmission Company, Compressor Station No. 7
 LA0109134, AI No. 3599
 Page 9

for this pollutant. Per the TMDL, point sources are so small as to be insignificant. Therefore, no requirements for pathogen indicators are established in the draft permit. The current permit limits are considered to be sufficient and no additional requirements are established in the draft permit.

TSS/Turbidity/Siltation

The TMDL for TSS, Turbidity, and Siltation for the Mermentau River Basin, final May 2, 2002, developed TMDLs for inorganic suspended solids, which do not affect permitted TSS discharges from facilities as fluvial erosion is considered to be the dominant contributor. This facility was not given a wasteload allocation for this pollutant. Per the TMDL, point source loads are so small as to be insignificant and, because effective policies are in place to limit TSS discharges, no specific reductions from point sources are required. Where TSS limits have previously been established in permits, TSS limits will remain as previously permitted. Therefore, no additional requirements for TSS are established in the draft permit.

Carbofuran

The TMDL for the Pesticide Carbofuran in the Mermentau River and Vermilion River-Teche River Basins, final March 21, 2002, developed a TMDL for the pesticide carbofuran. It was found that there are no known point source discharges of carbofuran in the Mermentau Basin, and therefore no allocation was given to point sources. Therefore, no requirements for carbofuran are established in the draft permit.

Fipronil

The TMDL for the Pesticide Fipronil in the Mermentau River Basin, final March 21, 2002, developed a TMDL for the pesticide Fipronil. It was found that there are no known point sources for fipronil in the Mermentau River Basin. Effluent from these point sources is not expected to contain fipronil because its use is limited to rice farming. Therefore, concentrations of fipronil in their effluents are not expected and would be considered an enforcement issue and dealt with accordingly. No requirements for fipronil are established in the draft permit.

Phosphorous

The Bayou des Cannes TMDL for Dissolved Oxygen and Nutrients, February 25, 2000, identified the Town of Iota as the only significant contributor to dissolved oxygen/low DO as well as nutrients. This facility was not given a wasteload allocation for this pollutant. Per the TMDL, point sources other than the Town of Iota are so small as to be insignificant. Therefore, no requirements for phosphorous are established in the draft permit. The current permit limits for oxygen demanding pollutants are considered to be sufficient and no additional requirements for oxygen demanding pollutants are established in the draft permit.

Statement of Basis for
Florida Gas Transmission Company, Compressor Station No. 7
LA0109134, AI No. 3599
Page 10

5. Stormwater Pollution Prevention Plan (SWP3) Requirement

A SWP3 is included in the permit since there is a potential for stormwater contamination from processes including storage and equipment washing areas.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of stormwater pollution and ensure the implementation of practices to prevent and reduce pollutants in stormwater discharges associated with industrial activity at the facility (see Part II, Paragraph K of the Draft Permit).